

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America )

v. )

Mateus Felipe DE SOUZA TEIXEIRA )

and )

Maria Das Dolores REIS SANTOS )

3:19-M -08687-LS

Defendant(s)

FILED  
2019 SEP 30 AM 10:44  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY 

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2019 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

*Code Section*

18 U.S.C 371

*Offense Description*

Two or more persons conspire to commit any offense against the United States, to defraud the United States, or any agency, in any manner or for any purpose.

This criminal complaint is based on these facts:

See Attached Affidavit


☒ Continued on the attached sheet.


Complainant's signature

Oscar Flores, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/30/2019


Judge's signature

City and state: El Paso, Texas

Leon Schydlower - U.S. Magistrate Judge

Printed name and title

Oath Telephonically Sworn

At 12:01 PM

Fed.R.Crim.P. 4.1(b)(2)(A)

## AFFIDAVIT

On September 24, 2019, Mateus Felipe DE SOUZA TEXEIRA (hereafter SOUZA) and Maria Das Dolores REIS SANTOS (hereafter REIS) were apprehended by United States Border Patrol after they entered the United States near the Paso Del Norte Port of Entry in El Paso, Texas. The place where SOUZA and REIS entered is not designated as a port of entry by immigration officials. SOUZA and REIS were identified as Brazilian citizens without the proper documents to be legally present in the United States (US). Therefore, SOUZA and REIS were transported to the Border Patrol Station for further processing.

At the Border Patrol Station, SOUZA and REIS presented themselves to immigration officials as mother and son. SOUZA and REIS also presented duly issued Brazilian passports bearing their name and photos to Border Patrol Agents (BPAs). However, the passport that SOUZA presented identified him as Mateus Felipe SANTOS with a DOB of December 30, 2001. Intake BPAs suspected potential fraud and referred SOUZA and REIS for further questioning.

Results of a DNA test indicted 99% negative that a parent/child relationship existed between SOUZA and REIS.

On September 26, 2019, BPA Carlos Castaneda and BPA Bruno Pimenta interviewed REIS regarding her relationship to SOUZA. The interview was conducted in the Portuguese language with the assistance of BPA Pimenta who is a native Portuguese speaker. REIS was served with her Miranda rights in the Portuguese language. REIS stated she understood her rights and agreed to answer questions without the benefit of counsel.

During the interview, REIS was advised of the DNA results. REIS then stated that she would tell the truth. REIS admitted that SOUZA was not her son. REIS stated that she accompanied SOUZA to a Brazilian agency posing as mother and son in order to obtain SOUZA's passport. REIS stated that SOUZA utilized a fraudulent ID card with a false name and DOB to make him a juvenile. REIS stated that SOUZA's mother made the arrangements and paid for them to come to the US.

BPA Castaneda and BPA Pimenta then interviewed SOUZA regarding his relationship to REIS. The interview was conducted in the Portuguese language with the assistance of BPA Pimenta who is a native Portuguese speaker. SOUZA was served with his Miranda rights in the Portuguese language. SOUZA stated he understood his rights and agreed to answer questions without the benefit of counsel.

During the interview, SOUZA admitted that REIS was not his real mother. SOUZA stated he met REIS when he traveled to Sao Paulo, Brazil, to obtain his passport. SOUZA stated he and REIS posed as a family unit (mother and son) when obtaining the passport. SOUZA stated he utilized a fraudulent ID with a false name and DOB. The false DOB used made SOUZA appear to be a juvenile. SOUZA provided the BPAs with his true and correct name and his true DOB of February 28, 1996, which makes him twenty-three years old. SOUZA stated his real mother paid \$6,000.00

USD to an unknown Brazilian smuggler and SOUZA was to pay an additional \$6,000.00 USD once he was settled and working in the US. SOUZA admitted that he knowingly presented a fraudulent passport in order to obtain an immigration benefit as a family unit.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included every fact know to me concerning this investigation.